



November 19, 2012

Chairman Julius Genachowski  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20054

Re: MB Docket No. 09-182, 2010 Quadrennial Review

Dear Chairman Genachowski:

On behalf of the Media Action Grassroots Network and the National Hispanic Media Coalition, we write to urge the Federal Communications Commission to reconsider its decision, as reported by the press, to relax certain media ownership rules without first performing the court-ordered analysis of data on the impact that allowing increased media consolidation would have on communities of color and women. The data released by the Commission on November 14 does not satisfy this burden and, if anything, only further demonstrates the dire need for the Commission to seriously consider proposals that would increase diversity rather than push forward a draft order that would relax rules and lead to more consolidation.

Collectively, we represent hundreds of organizations that serve America's communities of color and the poor, which number in the thousands. Traditionally, these communities have been vastly underrepresented in the media, both in terms of ownership and participation. As such, any attempt to loosen media ownership rules to allow further consolidation and make it more difficult for new voices to find a platform to be heard, is a cause of great concern for us, and our communities—which would be disproportionately impacted.

Achieving media diversity has long been a top priority of our institutions. We understand that the health and wellbeing of our communities rely on a diverse media—and therefore see it as an essential and non-negotiable component of our national communications policy. Media portrayals – which are inextricably linked to media diversity – are part of a complex interplay of opinion, fact, credibility and conventional wisdom that helps to construct the rules we live by. Loosening the rules will surely lead to an increase in media consolidation, granting further control of what we watch, hear and read to a handful of corporate conglomerates.

As history has shown, communities are vulnerable when they are not served by media that represents their interests. Given the importance of this issue, it is critical that any change in the media ownership rules should only occur after a complete analysis of broadcast ownership data and an opportunity for our communities to engage in substantive and thoughtful review of the findings.

Sincerely,

amalia deloney  
Associate Director  
Center for Media Justice

Jessica J. Gonzalez  
Vice President of Policy & Legal Affairs  
National Hispanic Media Coalition

**Supporting Organizations:**

Art is Change  
Center for Rural Strategies  
Community Media Services  
Community Media Workshop  
Families Rally for Emancipation and Empowerment  
Highlander Research and Education Center  
Human Rights Defense Center  
Institute for Local Self Reliance  
Line Break Media  
Main Street Project  
May First/People Link  
Media Literacy Project  
Media Mobilizing Project  
New Sanctuary Coalition  
REV/People's Production House  
Southwest Workers Union  
The People's Channel & Durham Community Media  
The Praxis Project  
Urbana Campaign-Independent Media Center  
Working Narratives  
Youth Media Project